

1 Keith L. Slenkovich (SBN 129793)
 Keith.Slenkovich@wilmerhale.com
 2 Joseph F. Haag (SBN 248749)
 Joseph.Haag@wilmerhale.com
 3 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 4 950 Page Mill Road
 Palo Alto, CA 94304
 5 Telephone: (650) 858-6000
 Facsimile: (650) 858-6100
 6

7 William F. Lee (*pro hac vice*)
 William.Lee@wilmerhale.com
 WILMER CUTLER PICKERING
 8 HALE AND DORR LLP
 60 State Street
 9 Boston, MA 02109
 Telephone: (617) 526-6000
 10 Facsimile: (617) 526-5000

11 James M. Dowd (SBN 259578)
 James.Dowd@wilmerhale.com
 12 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 13 350 S. Grand Avenue, Suite 2100
 Los Angeles, CA 90071
 14 Telephone: (213) 443-5300
 Facsimile: (213) 443-5400
 15

16 *Attorneys for Plaintiff* MEDIATEK INC.

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **OAKLAND DIVISION**

20 MEDIATEK INC.

21 Plaintiff,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.

24 Defendant.

Civil Action No. 4:11-cv-05341 (YGR)
(JSC)

STIPULATED REQUEST TO EXTEND
THE DEADLINE FOR CERTAIN
RENEWED ADMINISTRATIVE
MOTIONS FOR LEAVE TO FILE
UNDER SEAL

Hon. Jacqueline Scott Corley

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, plaintiff MediaTek, Inc. (“MediaTek”) requests that the Court extend from noon, August 23, 2013, until 2:00 p.m. August 26, 2013 the filing deadline for MediaTek’s Renewed Administrative Motions for Leave to File Under Seal (the “Renewed Administrative Motions”), solely for the deposition transcript exhibits related to MediaTek’s and defendant Freescale Semiconductor, Inc.’s (“Freescale”) Joint Letter Briefs Regarding MediaTek’s Third Notice of Rule 30(b)(6) Deposition (Dkt. No. 187) and MediaTek’s Use of Rule 30(b)(6) Deposition Hours (Dkt. No. 195). MediaTek and Freescale stipulate to this request.

This stipulated request is supported by the following facts:

- MediaTek filed the two Renewed Administrative Motions—by which MediaTek seeks to protect Freescale’s confidential business information included in the deposition testimony of the filed exhibits—on the first business day following this Court’s noon, August 23, 2013 deadline for renewed administrative motions for leave to file under seal (Dkt. Nos. 187 and 195; Dkt. No. 177);
- The Renewed Administrative Motions required the review and redaction of 11 deposition transcript excerpts and 20 full deposition transcripts to protect information designated by Freescale as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Stipulated Amended Protective Order in effect;
- Freescale has informed MediaTek that, despite its good-faith efforts, Freescale was unable to provide MediaTek with redacted versions of the exhibits to the parties’ Joint Letter Briefs Regarding MediaTek’s Third Notice of Rule 30(b)(6) Deposition and MediaTek’s Use of Rule 30(b)(6) Deposition Hours in time for MediaTek to

meet this Court's noon, August 23, 2013 deadline to file the Renewed Administrative Motions;

- Freescale represents that it has filed or will file, in support of this stipulated request, an accompanying sworn declaration describing these good-faith efforts to timely provide redacted versions of the full deposition transcripts and deposition excerpts;
- The parties agree that good cause exists for the requested one business day extension;
- The parties conferred regarding this request on August 23, 2013;
- Pursuant to Civil L.R. 6-2, MediaTek requests that this Court order, by signing below, that the deadline to file the two Renewed Administrative Motions is extended to 2:00 p.m., August 26, 2013, and MediaTek and Freescale stipulate to this request.

IT IS SO STIPULATED.

Dated: August 26, 2013

Respectfully submitted,

MEDIATEK INC.

By its attorneys,

/s/ Christopher A. Franklin

Keith L. Slenkovich (SBN 129793)

Keith.Slenkovich@wilmerhale.com

Joseph F. Haag (SBN 248749)

Joseph.Haag@wilmerhale.com

Christopher A. Franklin (SBN 272587)

Christopher.Franklin@wilmerhale.com

WILMER CUTLER PICKERING

HALE AND DORR LLP

950 Page Mill Road

Palo Alto, CA 94304

Telephone: (650) 858-6000

Facsimile: (650) 858-6100

William F. Lee (*pro hac vice*)

William.Lee@wilmerhale.com

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Wilmer Cutler Pickering Hale and Dorr LLP
950 Page Mill Road
Palo Alto, California 94304

Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

James M. Dowd (SBN 259578)
James.Dowd@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 S. Grand Avenue, Suite 2100
Los Angeles, CA 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400

Attorneys for Plaintiff MEDIATEK INC.

Dated: August 26, 2013

Respectfully submitted,

FREESCALE SEMICONDUCTOR, INC.

By its attorneys,

/s/ Joshua A. Hartman
RUDY Y. KIM (CA SBN 199426)
RudyKim@mofo.com
ALAN COPE JOHNSTON (CA SBN 66334)
ACJohnston@mofo.com
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, California 94304
Telephone: (650) 813-5600
Facsimile: (650) 494-0792

ALEXANDER J. HADJIS (pro hac vice)
AHadjis@mofo.com
JOSHUA A. HARTMAN (pro hac vice)
JHartman@mofo.com
MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, NW
Suite 6000
Washington, DC 20006
Telephone: (202) 887-1500
Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

United States District Court Judge

Wilmer Cutler Pickering Hale and Dorr LLP
950 Page Mill Road
Palo Alto, California 94304